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VIA EMAIL

December 21, 2018

Mario U. Zamora
Griswold La Salle Cobb Dowd & Gin LLP
111 Seventh Street
Hanford, California 93230

Re: Tulare City Councilman Carlton Jones
Tulare City Councilman Greg Nunley

Dear Mr. Zamora:

I have received a partial draft transcript of the deposition of Carlton Jones, taken yesterday at my office. Although the transcript has not yet been certified, I am including portions of the draft transcript in this correspondence to highlight just how far off the rails the councilman seems to have gone.

BY MR. LAMPE:

Q. If I told you that five people at city hall have testified under oath that they heard Joe Carlini say that he had you on credit card fraud, or something to that effect, would that surprise you?

A. If you said that?

Q. Yes.

- A. Nothing would surprise me.
- Q. Would it surprise you if they testified to that under oath?
- A. No. I wouldn't care.
- Q. That's not my question. I didn't ask --
- A. It wouldn't matter to me at all.
- Q. I'll give you an idea what they said. So -- take a look at what's been marked as Exhibit 12 in this proceeding. This is a contemporaneous memo taken by Chontelle Adney regarding a --
- A. Chontelle Adney is a bigger liar than you are.
- Q. All right.
- A. So I really wouldn't care what she says.
- Q. Okay. What about Roxanne Yoder? Is she a bigger liar than I am?
- A. No, you're a way bigger liar than Roxanne.
- Q. Okay. Is Roxanne Yoder a liar?
- A. I've known her to lie.
- Q. Okay. So Chontelle Adney is a bigger liar than I am, which I guess, in your mind, is a pretty big liar, right?
- A. Right, yeah.
- Q. I mean, in terms -- in terms of lying on 1 to 10, where do I stand? Am I an 8, 9, 10, 11?
- A. No, you'd be about a nine.

- Q. Chontelle is a ten?
- A. Oh, she's probably a 15.
- Q. Okay. All right. And where would Roxanne stand on the lying scale?
- A. I don't know. You know what, I've -- I've only known Roxanne to, like, be dishonest -- be dishonest on a couple of occasions.
- Q. Okay. So where would you put her?
- A. Like, an opportunist liar... So, like, a three or four.
- Q. What about Matt Machado?
- A. He's -- yeah, he's a liar.
- Q. Okay. Where does he sit on the scale?
- A. Like, a five.
- Q. Okay. What about Joe Carlini?
- A. Yeah, Joe can lie.
- Q. Where does he sit on the scale?
- A. I don't know. I have no idea. He's -- Joe's like a kid that lies to get out of trouble... I put Joe right around where Roxanne's at.
- Q. Three or four.
- A. Yeah.
- Q. So out of the -- out of -- what about Wes? Where would you put him on the liar scale?
- A. I don't think I put Wes. I think Wes put himself on the liar scale.

Q. Oh, okay. So where is he?

A. Like, a three.

Q. *Okay. Is there anybody at city hall who you think would not lie?*

A. *I don't think there's a person alive that won't lie.*

Q. *That include you?*

A. *Oh, yeah. I've lied tons of times.*

Q. Where would you put Jose Sigala?

A. I don't know if he -- I don't know. He's kind of like you.

Q. Well, I'm a nine. Is that what he is?

A. Well, yeah, you say stuff like you -- you'll say, "I heard you said this," and I don't know if -- you may have heard it, but I don't think you -- I think you know what you say is a lie.

Q. Okay. So is Jose a nine in your mind? Because this is going to be your word against, I think, a whole bunch of people's, Carlton.

A. Jose is just a -- just a POS in my book.

Q. POS meaning piece of shit?

A. Yeah.

Q. All right. So --

A. Who else is there? Macedo?

Q. Dave Macedo, yeah.

A. I'd say about a five.

Q. Okay. So he lies quite a bit.

A. No, you lie quite a bit.

Q. Okay. He lies sort of a lot, I guess.

A. Yeah... About half as much as you.

I must say, that in the 40 years I have been taking depositions, I have never had a witness so proudly and defiantly proclaim, under oath, that *"Oh, yeah. I've lied tons of times."*

If there is a strategy here, I'm missing it.

It is also interesting to note that when asked the same question about fellow Councilman Nunley, Mr. Jones was somewhat less judgmental:

Q. What about Greg Nunley?

A. Oh, my gosh. I don't know. I don't know.

Q. You have no -- you've got an opinion on everybody else but not on Greg?

A. Not everybody. I -- I don't know. I don't have an opinion on Darlene. I don't have an opinion on Greg.

I recognize that you cannot control Mr. Jones, but I again urge you to advise him to secure legal counsel. I think he is in way over his head at this juncture.

With respect to Mr. Nunley, I am in possession of the attached memo from Josh McDonnell, the Community and Economic Development Director. This memo provides, in relevant part that:

"As a result of the interaction between Mr. Nunley and staff on a recent building inspection, the City has put in place a system that removes the City Building Inspection staff from performing inspection services and plan checks from and at Mr. Nunley's projects.

The Interim City Manager has directed that Building Inspectors and the Building Official refrain from interacting with Mr. Nunley in any manner from this point forward. All plan checks and inspections related to Mr. Nunley's projects are going to be performed by an outside consultant, Interwest."

Please advise my office as to the following:

1. Is Interwest, the new outside consultant, being retained to work exclusively on Nunley-related projects; and
2. If so, will Mr. Nunley and his many development companies be paying for the future services of Interwest, or will this become an additional burden upon City taxpayers?

If you have questions regarding the contents of this correspondence, please do not hesitate to contact me.

Sincerely,

MICHAEL J. LAMPE
MJL/ml
cc: clients
all City Council members
press outlets